

# EXHIBIT B

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

**KRISTINA RAPUANO *et al.*, on behalf of  
themselves and all others similarly situated,**

*Plaintiffs,*

v.

**TRUSTEES OF DARTMOUTH COLLEGE,**

*Defendants.*

**CASE NO. 1:18-cv-01070-LM**

**DECLARATION OF JANE DOE 3 IN SUPPORT OF  
MOTIONS TO PROCEED UNDER PSEUDONYM [ECF No. 29 & 30]**

I, Jane Doe 3, declare as follows:

1. I make this Declaration based upon personal knowledge.
2. I am over 21 years of age and fully competent to make this Declaration. If called and sworn as a witness, I would testify competently as to the facts in this Declaration.
3. I am a Plaintiff in the above-captioned action.
4. To my knowledge, my name has not been publicly revealed in connection with this lawsuit and I have never been publicly identified in any news coverage. I have never spoken with any member of the news media in connection with my allegations or this case.
5. My allegations in the First Amended Complaint contain graphic details about the sexual assault and sexual harassment to which I was subjected by my professor while a student at Dartmouth. It is very important to me that these sensitive and personal details remain private. I have not shared the intimate details of my experiences with anyone except for a few close friends and family members, my attorneys, and my therapists.
6. The trauma I experienced at Dartmouth had lasting effects on my emotional and physical health. I became socially withdrawn and developed depression. I experienced issues with

disordered eating and I have had difficulties working with male colleagues due to concerns that they are judging me on my appearance rather than my science. In my years since leaving Dartmouth, contact from the former professors named in the lawsuit triggered immediate anxiety.

7. I ultimately transitioned to a different area of research and sought out female mentors due to the fears I developed as a result of the abuse I experienced while at Dartmouth. I have made significant progress in my recovery, and I now have a successful career. I continue to struggle with emotional distress over the treatment I received while at Dartmouth, as pains I endured are very much a part of me. I regularly experience intrusive thoughts related to my experiences and at times have even feared for my life and the well-being of my family.

8. I was initially afraid to come forward because of the harm doing so could have on my emotional state and professional career. However, I was comforted by the fact that this Court allowed Jane Doe 1 to join the lawsuit under a pseudonym, and I decided to come forward myself in the same manner.

9. When I learned that Dartmouth had filed an opposition to my use of a pseudonym, I suffered from severe anxiety and stress. I am terrified by the thought of intimate details regarding my sexual history and emotional state being revealed to my colleagues, friends, family, and the media. I feel especially vulnerable in light of the public coverage this case has received, both from media outlets and social media users. I am certain that I will suffer severe emotional distress and an overall worsening of my physical and psychological health if forced to reveal my identity at this point.

10. I do not believe that I will move forward as a Plaintiff in this lawsuit if I am forced to publicly identify myself. I know that public identification will exponentially increase my emotional distress and set me back in my ability to recover from my experiences.

11. I also fear that I will suffer reputational harm if I am forced to publicly identify myself. The career I have today was built on work I carried out at Dartmouth. Since the three former professors named in this lawsuit were my direct advisors and mentors, they served as references for me on multiple grant submissions and in my application for a position at my current institution. It is a significant worry that others, including current colleagues, collaborators, and funding agencies, will change their view of me as a strong and capable scientist upon learning of my past, the details of the environment in which I studied, and the opinions of these former advisors. In this way, I fear that public identification would wrongly and irreparably tarnish my scientific career. Given the sensitive and intimate nature of my experiences, I also fear personal reputational harm that would affect not only myself, but also my family.

12. Dartmouth's objection to the use of pseudonyms has been highly upsetting to me. Although the college claims to stand behind its former students and specifically claimed to admire our courage in coming forward, I feel it is now acting to silence us. This motion says to us, "be fully exposed, risk everything, or be silent." If the institution that claims to stand behind me truly appreciated the continued pain and distress I endured during my time at Dartmouth and now as an alumna, it would recognize that this demand is traumatizing in and of itself.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and accurate to the best of my knowledge and belief.

Dated: May 21, 2019

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*/s/ Jane Doe 3*  
Jane Doe 3